# TEXAS WATER COMMISSION



March 16, 1988


Ms. Shirley Workman
State Programs Section (6H-HS)
Hazardous Waste Management Division
Environmental Protection Agency
1445 Ross Avenue
Dallas, Texas 75202

Re: Texas FY 1988 RCRA Subtitle C Workplan and
Hazardous Waste Data Management System Update

Dear Ms. Workman:

The Texas Water Commission (TWC) is requesting the following changes be incorporated into the existing FY88 Workplan for Attachment I - RCRA Designated CEI Inspections. This list identifies those facilities which are required to be inspected as defined in Section I.B of the Texas Workplan.

I. <u>RCRA Land Disposal Facility Universe</u>

These facilities are identified in the Hazardous Waste Data Management System (HWDMS) where C305 = D.

1. American Chrome and Chemical TXD098818339 31661
Request: Remove from Workplan
HWDMS Update

On December 1, 1987, the TWC determined that the surface impoundment used for disposal of K006 waste is not regulated under RCRA, since K006 waste was only placed in the impoundment during the period of time the delisting was in effect. Accordingly, no RCRA units exist at this facility. For additional information see letter from EPA headquarters dated August 19, 1987.

Action: Remove as Scheduled FY88 CEI for land disposal;
Change C305 = D to C305 = Blank

2. Falcon Steel TXD058667973 TWC 32637
Request: Change C305=D to C305= Blank

The facility certified a full facility closure for five surface impoundments closed as nonhazardous waste management units. See letter from TWC dated 3/9/88 for additional information.

Action: Credit FY 88 CEI, to be added to HWDMS.

3. Gainsville Foundry TXD007322589 TWC 30911
Request: Change C305=D to C305=C

Gainsville Foundry certified the closure of a RCRA landfill on July 7, 1986. The TWC sent a closure certification acknowledgement letter on September 9, 1987. This facility certified a "clean closure". A CEI inspection was performed on 9/10/87.

Action: Credit FY88 CEI for land disposal.

4. Intercontintal Terminals TXD073912974 TWC 30966
Request: HWDMS Update

Intercontintal Terminals certified a full facility closure on 3/18/87. TWC sent a closure certification acknowlegdement letter on 9/4/87. Accordingly, this facility should be identified as a clean closed facility. A CEI was performed by TWC on 12/14/87.

Action: Change C305=D to C305=C; and
Credit FY88 CEI inspection for land disposal.

5. Poly-Cycle TXT490012689 TWC 67065
Request: Add to Workplan
HWDMS Update

Poly-Cycle is a land disposal facility identified by a CEI performed by TWC on 12/27/87.

Action: Credit FY 88 CEI; HWDMS updated 3/16/88.

6. San Antonio City Leon Creek TXD000815035 TWC 31857
Request: Update HWDMS

An Affidavit of Exclusion from RCRA permitting was approved on 3/4/88. The facility also certified a full facility clean closure on 5/6/87.

Action: The TWC Field Operations Division has requested this facility remain scheduled for a FY88 CEI for land disposal; and
Change C305=D to C305=C.

FALCON STEEL
TXD058607973 TWC 32637

Source: CME
10/26/87

a. Person(s) who collected samples for: inspection date 8/11/87

Facility - Samples not split with the TWC

TWC - Mary Ambrose

b. Number of wells co-sampled - 3
Total number of RCRA wells - 5

c. TWC Sample Schedule - Attachment A-13

d. TWC Field Notes - Attachment A-14

Comments:

D. Records and Response

1. Are TWC self-reporting files up to date and complete (yes/no)? YES . If no, explain.

2. Is the Students t-test applied to data as required by 31 TAC 335.112(a)(5)/40 CFR 265.93(b) (yes/no)? YES. If no, explain.

3. Evaluate the facility's record-keeping and response using the Ground-water Monitoring Checklist. Include as Attachment A-15 .

a. Has response to RCRA ground-water monitoring requirements been adequate (yes/no)? YES. If no, explain in comments.

b. Is facility record-keeping adequate (yes/no)? . If no, explain in comments. YES.

Comments:

4. Summarize, in chronological order, activities and correspondence relating to the ground-water monitoring program.

11-16-82 Company requests that they be exempted form the ground water monitoring rules. A copy of a report from 1980 is submitted to support the request.

12-14, 21, and 27-82 Enforcement action is considered and recommended against the company. Listed among the proposed violations is the failure to initiate a ground water monitoring program.

12-28-82 TDWR requests that Falcon Steel submit a Part A.

01-25-83 Part A received.

01-25-83 Ground-water monitoring waiver demonstration is denied. Company is given 90 days to install a ground-water monitoring system for the facility and to commence monitoring ground water.

03-21-83 Conference record indicates that the company will install a ground-water monitoring system, but requested a partial waiver of sampling requirements (drinking water standards). Consultant estimated two weeks to install wells about 50 to 55 feet deep. The consultant will suggest parameters for analysis as part of a sampling plan.

04-05-83 Groundwater Monitoring Plan is submitted for Falcon Steel. Location of monitoring well as submitted for approval. Constituents to be sampled and a sampling schedule, sample collection procedures, analytical procedures, and chain of custody control are addressed.

04-13-84 Locations of monitor wells discussed. Monitor well locations 1, 2, and 4 are satisfactory as proposed. Monitor well 3 location is questionable. Consultant proposes a fifth well to better define flow direction. The compliance agreement would address special sampling requirements for indicator parameters during the 1st year of sampling.

05-03-83 Copies of the Compliance Agreement were issued to the Company. Acceptance of the agreement should be indicated within 20 days.

05-20-83 Revised Ground-water Monitoring Plan submitted.

05-17-83 Compliance Agreement signed.

06-14-83 Approval of the implementation of the Ground-water Monitoring Plan is given subject to the following modifications:

1. The monitor wells should be drilled in such a manner so as to detect water-bearing zones which might occur at shallower depths than the anticipated completion depth of 50 feet. Should any such zones be encountered, the well should be completed to include these zones.

2. Well construction diagrams and logs of subsurface geology should be incorporated into the monitoring plan after completing the installation of the monitor wells.

07-22-83 Draft closure plan submitted.

07-26-83 Revised Groundwater Monitoring Plan submitted. Installation of the five groundwater monitoring wells is included.

09-28-83 Initial sample results from the monitoring wells submitted.

06-01-84 Industrial Solid Waste Disposal Compliance Monitoring Inspection conducted. The following ground-water monitoring deficiencies found: 1. Water level measurements in ground water monitoring wells should be reported relative to mean sea level (MSL) for each sampling event. As part of the static information, monitor well casing tops should also be reported relative to MSL. 2. The ground water monitoring plan does not include an outline of a ground water quality assessment program, which would be implemented if statistically significant differences were observed in contamination indicator parameters. 3. Means and variances of replicate samples for the contamination indicator parameters should be calculated for the second and third quarterly sampling events as specified in the compliance agreement accelerated sampling schedule.

10-02-84 TDWR letter providing instructions and compliance time frames addressing the deficiencies of the June 1, 1984 inspection as discussed during meetings of August 14 and 23, 1984. Company is given 30 days to respond in writing to the deficiencies with a detailed description of corrective actions taken or anticipated completion date. Within 60 days the company must submit a revised closure plan and closure cost estimate based on the modified closure procedure discussed during the Aug. 23, 1984 meeting.

10-30-84 Co. response to deficiencies. Future ground water sampling will refer to elevations in terms of mean sea level. A Ground Water Quality Assessment Program will be implemented in accordance with 31. TAC 335.194. Means and variances of replicate samples have been calculated for the past year's experience.

12-03-84 Technical conference to discuss conceptual closure plans for the 5 acid ponds: 1) neutralize spent pickle liquor in ponds, using a suitable caustic substance; 2) decant neutralized liquid to POTW; 3) dry sludges and stabilize metals with pH adjustment; 4) neutralize in-place soils; and 5) close and cap. Possible problem: waste is listed (K062) and neutralization only may not relieve Co. of need for a Pt. B permit. Soils may have to be de-listed by EPA.

12-27-84 Part B called.

02-04-85 Draft of the closure and post-closure plan for the surface impoundments submitted.

03-21-85 Notification that Co. should publish a Notice of Final Facility Closure is sent.

03-21-85 TDWR letter to amend the directives of the 10-02-84 letter. Co. is informed that Permits Division will review the closure plan and approve or modify the plan through separate correspondence. Falcon Steel is directed to immediately accomplish the following: 1) cease all pumpage of hazardous waste to impoundments; 2) begin neutralizing the remaining liquids in the impoundments according to the procedures described in the Feb. 4, 1985 draft closure plan; and notify the central office and the District 4 office in Duncanville upon completion of neutralization.

03-27-85 TDWR letter notifying Co. that the closure plan is deficient in several areas including a description of the Ground-water Monitoring program that will implement in response to 31 TAC 335.356. Co. should propose a list of parameters, with analytical methods, more specific to the waste streams than the interim status indicator parameters. Co. is informed that the five surface impoundments appear to be regulated units and that the owner/operator is required to have a permit throughout a 30-year post-closure care period and to provide maintenance and ground-water monitoring unless they can demonstrate that all waste residues, system components, subsoils, structures, and equipment contaminated with waste and/or leachate have been removed or decontaminated. The Co. must demonstrate that all hazardous constituents identified in Appendix VIII of 40 CFR Part 261 have been removed from the impoundment area or are not present in levels in excess of that found in area soils unaffected by waste management activities.

04-18-85 Closure Plan resubmitted.

04-24-85 Affidavit of the publisher of the Kaufman Herald regarding the publishing of the required notice of closure.

05-31-85 Approval of the closure plan is given with modifications that include: the Co. shall submit a permit application for post-closure care of the waste management area by June 21, 1985; and the Co. shall submit, by June 21, 1985, a post-closure care plan for Executive Director approval which complies with all applicable requirements of 31 TAC Subchapters I, J, and Q.

06-13-85 Due to abnormally high readings of Electrical Conductivity in monitoring wells 1 and 3, an assessment plan to determine if any hazardous constituents have migrated to the ground water is submitted. See Attachment XXX for Plan dated June 11, 1985.

06-24-85 Co. uses one additive in their pickling acid. This product does not contain Appendix VIII constituents. Other than spent pickle liquor, the Co. has not placed any hazardous wastes (including solvents, paints, machine oils, or other

waste products from galvanizing or fabrication operations) in the impoundments.

06-24-85 Post-Closure Care Plan submitted as an application for a Post-Closure Care permit for the five surface impoundments being closed. This plan is submitted to address items in the letter of 05-31-85.

08- -85 Facility status sheet, Ground Water Monitoring Page indicates that the well system cannot adequately be evaluated until the wells are surveyed to determine water elevation for the purpose of determining the groundwater flow direction. Mr. Evans had analytical data for the first year monitoring and the first half of the second year. Groundwater surface elevations have not been determined. Groundwater elevations have been measured as the distance from the ground surface to the water table. No sampling and analysis plan or groundwater quality assessment plan was at the facility.

10-25-85 Results for sampling monitor wells on Aug. 27, 1985. Again a difference was detected in the specific conductance in wells 1 and 3. The Co. will re-sample these two wells, and reanalyze for specific conductance on 10-29-85.

12-10-85 Co. request an extension for their closure of the acid-settling ponds until August of 1986.

01-03-86 Investigation Report (follow up on November 21, 1985 report). Ground-water related deficiency was that the facility does not convert groundwater level measurement into relative elevations as required by TAC 335.193.

03-03-86 IOM transmitting for action by the Legal division the Executive Director's Noncompliance Report.

03-18-86 Preliminary Enforcement Report for not providing financial assurance for closure costs or for post-closure care cost and on Sept. 29, 1985, a release from one of the impoundments discharged to an adjacent drainage ditch and caused a fish kill downstream in Buffalo Bayou. Transmitted to the TWC Chief Clerk's office, Public Interest Advocate and the Company.

03-25-86 Co. request a hearing to discuss the Administrative Penalties.

04-15-86 Settlement conference held. Quarterly progress report for the 1st quarter 1986 for the surface impoundment submitted. All groundwater elevations are reported with respect to MSL casing elevations. A concrete pad, approximately 30 inches x 30 inches, and new bentonite seal was placed around each casing to provide better protection against infiltration of

surface water, as well as provide a work area for sample collection.

04-30-86 Order issued requiring Administrative Penalties and requiring actions of Falcon Steel Co. Transmitted to Co. on May 2, 1986.

05-30-86 Co.'s consultant submitted a copy of the EPA ruling (Federal Register, May 28, 1986) which states the final rule for spent pickle liquor. The rule applies only to persons who produce iron and steel. Spent acids from other steel finishing operations would be considered hazardous only if they exhibit one or more of the hazardous characteristics.

05-30-86 Co.'s consultant submitted information describing actions taken by Falcon Steel Company to comply with requirements of the Enforcement Order of the Texas Water Commission. Included is a manual entitled "Hazardous Waste Management Manual for 90-Day Storage". This manual should include a section on groundwater sampling plan and analysis. Due to recent EPA final ruling concerning the listing of spent pickle liquor, the post-closure care plan will require modification. The updated plan or revisions will be forwarded following discussion with TWC on the effects of the ruling.

06-03-86 Preliminary Assessment is transmitted to EPA. A review of ground water monitoring data from around the surface impoundments does not indicate any releases.

07-09-86 Groundwater monitoring reports for wells located at Falcon Steel Co., Kaufman submitted by consultant. Samples collected May 21, 1986 from wells 1 through 4. These wells showed significant increase, according to the Student t-test, in specific conductance and/or total organic halogen in the first semiannual sampling period, and were therefore resampled and analyzed for the required parameters. The second sampling does not reflect significant increases in any well. Therefore, the Co. will continue with sampling and analyses of contamination and groundwater quality indicators as previously required. The second semiannual sampling period for 1986, scheduled in August, will be the last collected under the interim status groundwater monitoring program, since closure of the surface impoundments a t Falcon should be completed by Aug. 31. Following closure, groundwater samples will be collected and analyzed according to the post-closure care plan after its approval.

07-16-86 Closure progress report for the second quarter submitted.

07-17-86 Consultant submits a request to amend the closure plan

("Closure Plan for Spent Acid Surface Impoundments", April, 1985). The amendments consisting of 1) elimination of lime injection of the closed units [Throughout the residual mud drying process, a neutralizing agent (calcium hydroxide) has periodically been added to facility drying and raise pH values. Testing of soil samples indicate a pH above 2. EP Toxic Metal testing of soils shows values less than the standards. Co. believes that mixing mixing the neutralizing agent during drying has effectively achieved the desired goals, and elimination of the lime injection phase is justified. The elimination of the "active" acidity, coupled with the natural soil barrier (calcium carbonate clays) and the elimination of the hydraulic downward gradient with the clay cap will insure protection of the groundwater after closure of these impoundments.], 2) amendment of the analyses for verification of closure [requests to remove analysis for total Ag, As, Ba, Hg, and Se, since these metals have either not been detected or are at very low concentrations in previous analyses of the residual muds.], 3) waste classification determination [propose to close the facility as a nonhazardous landfill. Co. requests that the TWC determine if the residual material is a Class I or II waste.], and 4) reduction of final cover thickness because waste will not be hazardous.

07-22-86 EPA review of the Preliminary Assessment has determined that a Remedial Investigation (RI) is needed for the five closing surface impoundments due to pickle liquor releases.

08-07-86 TWC response to the requested amendments. Lime injection of the residual mud and subsoil may be eliminated. Analyses for metals is still required. The material in the surface impoundments is no longer listed waste K062, but is hazardous waste due to the characteristics of corrosivity and EP toxicity. The surface impoundments can be closed as a nonhazardous landfill if treatment of the waste has rendered it nonhazardous. A review of the data submitted resulted in a determination that the landfill may be closed as a Class II landfill. The compacted clay cap thickness may be reduced to two feet with an overlying layer of one foot of topsoil.

09-06-86 Closure of units held up by rains and equipment breakdowns resulting in the Co. not meeting the August 31, 1986 deadline. Final stages of closure should be completed in two to four weeks. TWC will be informed weekly of the closure progress.

09-30-86 Closure update, cover construction should be completed by October 17.

10-03-86 Letter to EPA indicating that the TWC no longer feels that

a Site Investigation or Remedial Investigation is necessary due to the waste reclassification and closure activities for the five surface impoundments.

12-18-86 Results of analyses of verification samples collected following closure of the five spent acid surface impoundments submitted. A final closure and post-closure report should be submitted by mid-January.

03-16-87 Documentation for the closure of the five spent acid impoundments for Falcon Steel Company, Kaufman County, is submitted. Includes verification sample analysis, cover construction data, deed recordation and certification of closure by David Neuse, P.E., of Jones and Neuse, Inc. The verification data supports analysis previously submitted and verifies that the residual material landfilled on Falcon Steel property is Class II material.

07-20-87 Review of the "Final Closure Documentation and Post-Closure Care Plan" indicates that the report completes closure procedures for the five spent acid surface impoundments in accordance with 31 TAC 335.112(a)(6) and (10). The Post-Closure Care Plan is undergoing further review by the Ground-water Enforcement Unit staff and will be addressed in a separate correspondence.

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# TEXAS DEPARTMENT OF WATER RESOURCES

1700 N. Congress Avenue
Austin, Texas



May 31, 1985

Mr. Eddie E. Evans
Falcon Steel Company
Kaufman Division
P. O. Box 269
Kaufman, Texas 75142

Dear Mr. Evans:

Re: Closure of Hazardous Waste Management Facility
Solid Waste Registration No. 30370

We have completed review of your facility's closure plan for five surface impoundments submitted by your letter of April 18, 1985. This activity represents full closure of hazardous waste management operations at the facility. Our review indicates that the closure plan, along with the modifications stated herein, substantially conforms with the requirements of 31 Texas Administrative Code (TAC) 335 Subchapter J and should provide reasonable assurance of effective industrial solid waste management.

This letter constitutes approval by the Executive Director of the closure plan described above and modified below. The closure plan is hereby modified to include the following items:

1. All closure activities including certification shall be completed within six months of the date of this letter.

2. Spray irrigation of the impoundment liquids is prohibited. All impoundment liquids shall be disposed of by the following method(s):

   a. Off-site disposal at an authorized industrial waste management facility;

   b. Off-site discharge to a POTW compliant with 40 CFR 270.10 and 31 TAC 335.47 after obtaining the POTW's approval;

   c. Evaporation; or

   d. Solidification within the impoundment.

3. Each landfill cap shall be mounded slightly above surrounding grade to provide a cover slope of two to five percent.

4. A minimum of two Proctor Density tests and two Atterberg Limits tests shall be performed on the material to be used for the compacted clay cover.

5. A minimum of two field density and moisture content tests shall be performed on each lift of the compacted clay cover.

6. The results of all soil tests and analyses performed shall be submitted with the closure certification.

7. A deed recordation for the disposal area shall be submitted.

8. The company shall submit a permit application for post-closure care of the waste management area by June 21, 1985.

9. The company shall submit a post-closure care plan for Executive Director approval which complies with all applicable requirements of 31 TAC Subchapters I, J, and Q. This plan shall be submitted by June 21, 1985.

Should you have any questions regarding this matter, please contact Alice Hamilton of the Industrial Solid Waste Section at AC512/463-8181.

Sincerely,

Charles E. Nemir
Executive Director

(AKH:bb)
Enclosure
cc: TDWR District 4 Office - Duncanville

PS Form 3811, July 1983 447-845

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Falcon Steel Company
P.O. Box 269
Kaufman, TX 75142

4. Type of Service:

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Article Number

20601

Always obtain signature of addressee or agent and DATE DELIVERED.

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6. Signature – Agent

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11-4-85

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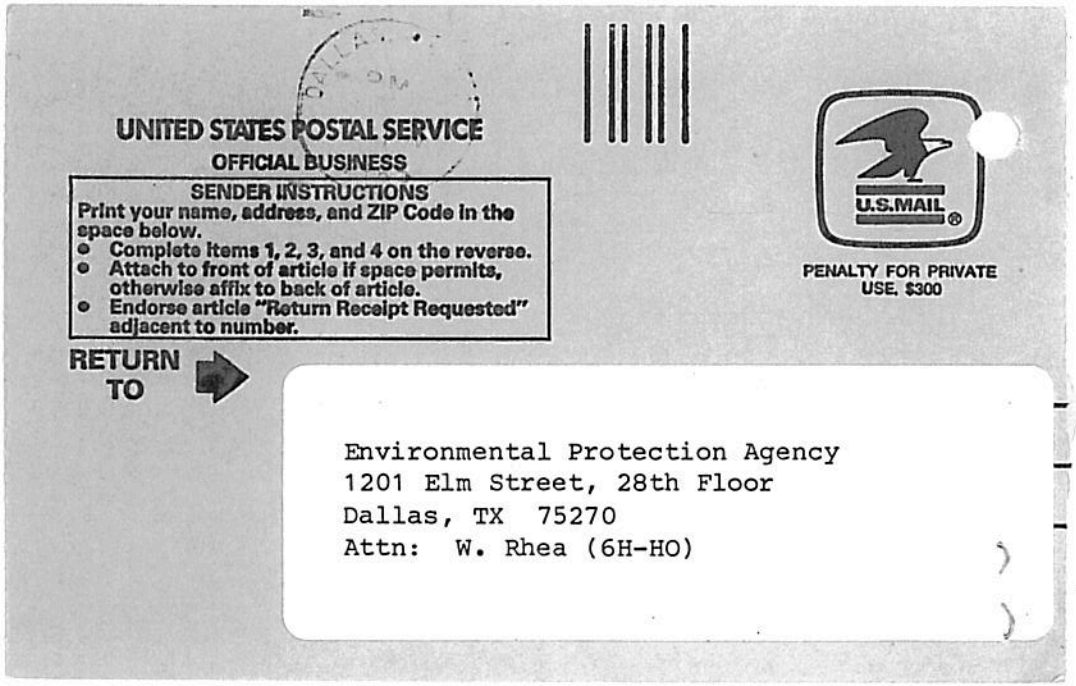

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PENALTY FOR PRIVATE USE, $300

Environmental Protection Agency
1201 Elm Street, 28th Floor
Dallas, TX 75270
Attn: W. Rhea (6H-HO)

#32601

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# TEXAS DEPARTMENT OF WATER RESOURCES

1700 N. Congress Avenue
Austin, Texas







March 21, 1985

Lewis PSL
Kimble
McGinley RWL
Dixon
Fleming

Mr. Eddie E. Evans
Executive Vice President
Falcon Steel Company, Kaufman Division
P.O. Box 269
Kaufman, Texas 75142

Dear Mr. Evans:

Re: Solid Waste Registration No. 32637

This letter is intended to amend the directives of our October 2, 1984 letter which directed you to revise the site's closure plan and to provide closure and post-closure financial assurance based on the revised closure cost estimate. We note that a closure plan has been submitted to the Department to satisfy this requirement and that Falcon Steel intends to close its hazardous waste facilities in lieu of obtaining a permit for continued operation. The Permits Division will review the closure plan and approve or modify the plan through separate correspondence.

We further note that the financial assurance required in Item 3 of the October 2, 1984 letter has not been provided. The deadline for compliance will be extended to December 15, 1985, the estimated date of completion for all five impoundment closures, provided that Falcon Steel minimize the potential for harm to human health and the environment posed by these impoundments by immediately accomplishing the following:

1. Cease all pumpage of hazardous waste to the impoundments;

2. Begin neutralizing the remaining liquids in the impoundments according to the procedures described in the February 4, 1985 draft closure plan.

3. Notify this office and the District 4 Office in Duncanville upon completion of neutralization.

If you have any questions, please contact Mr. Paul Lewis at (512) 475-5633 or Mr. Russell Kimble at (512) 475-5695.

Sincerely,

Robert G. Fleming, P.E.
Director
Enforcement and Field Operations Division

PSL:mk

cc: Ms. Alice Hamilton, Permits Division
Mr. Russell Kimble, Enforcement and Field Operations Division
Texas Department of Water Resources District 4 Office

TEXAS DEPARTMENT OF WATER RESOURCES
1700 N. Congress Avenue
Austin, Texas

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Executive Director

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Paul Hopkins, Chairman
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Ralph Roming

DEC 27 1984

HAMILTON
AUSTIN
SNOW
MESSENGER

Mr. Eddie E. Evans
Falcon Steel Company
Kaufman Division
P.O. Box 269
Kaufman, Texas 75142

Dear Mr. Evans:

CERTIFIED MAIL

Re: Hazardous Waste Permit Application No. 20253
Solid Waste Registration No. 32637
Falcon Steel Company - Kaufman Division

The Texas Department of Water Resources (TDWR) is implementing the hazardous waste permitting program for industrial solid waste facilities in Texas. Our records indicate that you filed a state and/or federal Part A hazardous waste permit application for an operational hazardous waste storage, processing, and/or disposal facility as referenced above. In accordance with Title 31 Texas Administrative Code (TAC) Section 341.180, we hereby request submittal of Part B of your hazardous waste permit application, as well as any necessary modifications or additions to the Part A application currently on file. The Part B application and Part A modifications are due by June 21, 1985.

Please find enclosed for your use a blank Part A application form. If the Part A application currently on file with TDWR, including any revisions submitted since the original filing, does not accurately reflect hazardous waste management activities at the facility, then the Part A should be revised accordingly. If wastes remain listed on the Part A which you no longer consider to be hazardous, you must submit appropriate documentation accompanying the revision to support the deletion. Likewise, if a unit is identified on the Part A which is not now considered to be a hazardous waste management unit, you must support the deletion by:

1) demonstrating that the unit has been or will be closed pursuant to a closure plan approved by the Executive Director;

2) demonstrating that the unit has not been used for hazardous waste management since November 19, 1980; or

3) demonstrating that the unit qualifies for an exclusion from permitting as prescribed in the TDWR's hazardous waste rules.

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If you intend to delete hazardous waste or hazardous waste management units from the facility's Part A, you should upon receipt of this letter contact the Solid Waste Section contact person indicated below and initiate the necessary actions. When you submit the facility's Part B permit application, it must fully address each hazardous waste and hazardous waste management unit which is identified on the Part A.

The fee for filing an application is $25 plus the cost of required notice, which is a minimum of $5. Therefore, a person filing an application for an original permit must submit a fee of $30 unless the application fee was paid at the time the original Part A application was filed.

If your company's Part A application, currently on file with the Department is incomplete or if any item in the application was not adequately addressed, as explained in the instructions, then your company must submit the additional information with the Part B application. Please note that the numbering system in the enclosed Part A may be different from the Part A application your company currently has on file. Accordingly Part A revisions should be made using the enclosed Part A application form.

Also please find enclosed for your use a copy of the industrial hazardous waste Part B permit application form and instructions. The instructions cover the technical requirements of the application in detail and are not to be submitted with the application. You are required to submit five copies of the entire application including all related reports and four additional copies of Section I of the application form. Please be aware that in order for you to meet the required submittal date certain types of demonstrations, if applicable, must be initiated shortly after receiving this letter. As a result, you should upon receipt of this letter contact this Section and initiate necessary action if:

1) Your company intends to pursue any type of waiver or exemption;

2) Your company is required to do synthetic membrane liner compatibility testing (i.e., a 120-day test using EPA Test Method 9090) for new waste management units or lateral expansion of existing units; or

3) Your company is required to conduct field tests or laboratory analyses in conjunction with the treatment demonstration required for land treatment units.

Your company must also determine for each waste management area whether a detection groundwater monitoring program, a compliance monitoring program, or a corrective action program is required. If the presence of hazardous constituents has not been detected in the ground water at the time of the permit application, your company must submit sufficient information to establish a detection monitoring program. If a detection monitoring program is required, your company must prepare a ground water

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monitoring report in response to Section V of the Part B permit application which meets the informational requirements of 40 CFR Part 270.14(C)(1), (2), (3), (5), and (6). If the presence of hazardous constituents has been detected in ground water at the point of compliance at the time of permit application, your company must submit sufficient information to establish a compliance monitoring program. If a compliance monitoring program is required, your company must prepare a compliance plan report in response to the Ground Water Compliance Plan Application which meets the informational requirements of 40 CFR Part 270.14(C)(1), (2), (3), (4), (5), and (7). The conditions which would require your company to submit sufficient information to establish a corrective action program are described in 40 CFR Part 270.14(c)(8). You will find enclosed a copy of the Ground Water Compliance Plan Application which is for your use if either a compliance monitoring or corrective action program is required. In this event, the original and eight copies of the Ground Water Compliance Plan Application must be submitted with the Part B.

In addition to the information specified in the Part B application form, TDWR rules require you to submit the following information:

1. The location and areal exent of all non-hazardous and hazardous waste disposal units (past and present) on the plant site should be indicated on the plan-view drawing required in III.A.2. of the Part B [31 TAC Section 341.153(7)(C)];

2. The staffing pattern for the facility should be submitted including the qualifications of all key operating personnel whose duties include waste management [31 TAC Section 341.180(2)]; and

3. A physical description and current representative chemical analysis should be submitted for each waste which your company feels is not hazardous and which is commingled in a storage or disposal unit covered by the Part B application [31 TAC Section 341.180(3)].

Extensions of time will generally not be considered for completion of the permit application. Late or incomplete applications may result in dismissal of the application, a recommendation to authorize only compliant portions of the facility, or permit provisions requiring closure of all or part of the facility. Additionally, under the Resource Conservation and Recovery Act Amendments of 1984, all land disposal facilities operating under interim status must file a complete Part B application by November 9, 1985 or lose interim status authority to operate. To avoid these problems, please discuss your application with the permit technician indicated below within thirty days to assure that the contents of the application will meet the regulatory requirements.

Communications relating to the Parts A and B of the permit application should be directed to Alice K. Hamilton of the Solid Waste Section at AC512/475-2041.

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Communications relating to the Ground Water Compliance Plan Application should be directed to Paul Lewis of the Enforcement and Field Operations Division at AC512/475-5696.

Sincerely,

Jay Snow, P.E., Chief
Solid Waste Section

ALM:mw
Enclosures
cc: TDWR District 4 Office - Duncanville
Paul Lewis, Solid Waste & Spill Response - Austin
Russell Kimble, Solid Waste & Spill Response - Austin

~~20253~~
32637

20263
KAUFMAN

JKB

T-DH, DIST 4

32472

TEXAS DEPARTMENT OF WATER RESOURCES

PERMIT APPLICATION
FOR
INDUSTRIAL SOLID WASTE STORAGE/PROCESSING/DISPOSAL FACILITY

PART A - FACILITY BACKGROUND INFORMATION

I. GENERAL INFORMATION

A. Applicant: Falcon Steel Company, Kaufman Division
(Individual, Corporation, or Other Legal Entity Name)

Address: P. O. Box 269 (1200 Rand Road)

City: Kaufman State: Texas Zip Code: 75142

Telephone Number: 214-932-2157

~~B.~~ Authorized Agents

1. List those persons or firms authorized to act for the applicant during the processing of the permit application. Also indicate the capacity in which each person may represent the applicant (engineering, legal, etc.). The person listed first will be the primary recipient of correspondence regarding this application. Include the complete mailing addresses and phone numbers.

Eddie E. Evans, Exec.Vice Pres., P.O.Box 269,Kaufman,Texas 7514
(Phone: 214-932-2157)

John M. Walker, Plant Manager, P. O. Box 269,Kaufman,Texas 7514
(Phone: 214-932-2157)

2. List the individual and his/her mailing address that will be responsible for causing any necessary public notices to be published in the newspaper.

Name: Eddie E. Evans

Address: P. O. Box 269

City: Kaufman State: Texas Zip Code: 75142

Telephone Number: 214-932-2157

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3. List the applicant's registered agent for service.

Name: Sterling Steves

Address: 524 Fort Worth Club Building

City: Fort Worth State: Texas Zip Code: 76102

Telephone Number: 817-335-6538

C. Operator: Identify the entity who will conduct facility operations. If same as applicant, state "same as applicant."

Name: John M. Walker

Address: P. O. Box 269

City: Kaufman State: Texas Zip Code: 75142

Telephone Number: 214-932-2157

D. Ownership

1. Indicate the ownership status of the facility:

a. Private X

(1) Corporation X
(2) Partnership
(3) Proprietorship
(4) Non-profit organization

b. Public

(1) Federal
(2) Military
(3) State
(4) Regional
(5) County
(6) Municipal

c. Other (specify)

2. Is facility and site property owned by applicant?

X Yes No

If you checked "no",

a. Submit as an attachment a copy of the lease for use of said facility and/or site property, as appropriate; and

b. Identify the facility and/or site property owner. If same as applicant in Part A above, state "same as applicant." If different from the applicant, please note that the owner is required to sign the application on page 5.

Name: Same as applicant

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Number: _____

E. Type of Permit Application:

1. New _____
2. Amendment _____ (TDWR Permit Number: 01744 )

F. Registration and Permit Information

1. Denote your TDWR Solid Waste Registration Number. If none, state "none."

32637

2. Indicate (by listing the permit number(s) in the right-hand column below) all existing or pending State and/or Federal permits or construction approvals which pertain to pollution control or industrial solid waste management activities conducted by your plant or at your location. Complete each blank by entering the permit number, or the date of application, or "none".

| Relevant Program and/or Law | Permit No. | Government Agency* |
|---|---|---|
| a. Texas Solid Waste Disposal Act | | |
| b. Wastewater disposal under the Texas Water Code | 01744 | TDWR |
| c. Underground injection under the Texas Water Code | | |
| d. Texas Clean Air Act | | |
| e. Texas Uranium Surface Mining & Reclamation Act | | |
| f. Texas Surface Coal Mining & Reclamation Act | | |
| g. Hazardous Waste Management program under the Resource Conservation and Recovery Act | | |

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| | | | |
|---|---|---|---|
| h. | UIC program under the Safe Drinking Water Act | _____ | _____ |
| i. | NPDES program under the Clean Water Act | _____ | _____ |
| j. | PSD program under the Clean Air Act | _____ | _____ |
| k. | Nonattainment program under the Clean Air Act | _____ | _____ |
| l. | National Emission Standards for Hazardous Pollutants (NESHAPS) preconstruction approval under the Clean Air Act | _____ | _____ |
| m. | Ocean dumping permits under the Marine Protection Research and Sanctuaries Act | _____ | _____ |
| n. | Dredge or fill permits under section 404 of the Clean Water Act | _____ | _____ |
| o. | Other relevant environmental permits | _____ | _____ |

* Use the following acronyms for each agency as shown below:

TDWR = Texas Department of Water Resources
TACB = Texas Air Control Board
TRC = Texas Railroad Commission
TDH = Texas Department of Health
TDA = Texas Department of Agriculture
EPA = U. S. Environmental Protection Agency
CORPS = U. S. Army Corps of Engineers

G. Description of Business

1. Give a brief description of the nature of your business.

**Steel fabrication and hot-dip galvanizing**

2. List the principal products and/or services which are provided by your plant. Please itemize by Standard Industrial Classification (SIC) codes.

**Fabrication and galvanizing of transmission towers and substations for the electrical utility industry; and sign structures and bridge rail for ultimate use by the State Department of Highways and Public Transportation.**

I, Eddie E. Evans (Name), Exec.V.P., and Gen. Mgr. (Title)

I, John M. Walker (Name), Plant Manager (Title)

Certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete.

Signature: Eddie E. Evans, Date: January 20, 1983

Signature: John M Walker, Date: January 20, 1983

SUBSCRIBED AND SWORN to before me by the said Eddie E. Evans and John M. Walker on this 20th day of January, 19 83.

My commission expires on the 31st day of December, 19 84.

Anna J. Meacham
Notary Public in and for
The State of Texas

Kaufman County, Texas

**TEXAS DEPARTMENT OF WATER RESOURCES**
**AUSTIN, TEXAS**

Receipt No. 83- 2472

Date 1/24/83 Amount 5.00

Received From Falcon Steel Co.

Address Kaufman, TX For

| | | | | |
|---|---|---|---|---|
| G.R. Fd. 001, Unappr | CC 09644 | | | Suspense Fd. 900 CC 09642 |
| G.R. Fd. 001, Appr | CC | | | Filing Fee |
| Spec. Fd. 041 FY | CC | | | Recording |
| Spec. Fd. 153 FY 83 | CC 11371 | 5.00 | | Use Fee |
| Spec. Fd. 158 FY | CC | | | Storage |
| Spec. Fd. FY | CC | | | Postage |

Comptr. Rev Code 3754 TDWR Rev Code

Type of Fee or Revenue Waste Discharge Permit - Postage

Type of Remittance Ck # 7786 Received by MW

TDWR-0756

II. SITE BACKGROUND INFORMATION

A. Location of Site

1. Facility Name: Falcon Steel Company, Kaufman Division

Street Address, if available: 1200 Rand Road

Kaufman, Texas 75142 County: Kaufman

2. Are your waste management operations within the extraterritorial jurisdiction of a municipality?

x Yes ____ No

If you checked "yes," what municipality? City of Kaufman

3. Give a verbal description of the location of the facility site with respect to known or easily identifiable landmarks.
**On Farm-to-Market Road 1836, approximately 1/2 mile from intersection of 1836 and Washington Street in the City of Kaufman.**

4. Detail the access routes from the nearest U.S. or State Highway to the facility site.

**Washington Street is State Highway 34.**

5. Submit as "Attachment A" a United States Geological Survey (USGS), $7\frac{1}{2}$ minute quadrangle map. Indicate on this map the location of the site and the land use patterns of the areas within 1 mile (1.6 km) of the site boundaries (e.g., residential, commercial, recreational, agricultural, undeveloped, etc.). Each area of land use should be labeled on the map. (Note: if such a map is not available, submit a substitute map such as a State Department of Highways and Public Transportation county map or a city map with sufficient scale to adequately show the site location and surrounding land use patterns.

6. a. Submit as "Attachment B" a map indicating the boundaries of all adjacent parcels of land, and a list of the names and mailing addresses of all adjacent landowners and other nearby landowners who might consider themselves affected by the activities described by this application. Cross-reference this list to the map through the use of appropriate keying techniques. The map should be a USGS map, a city or county plat, or another map, sketch or drawing with a scale adequate enough to show the cross-referenced affected landowners.

b. Indicate from what source(s) the names and addresses of persons identified as affected were obtained.

| | |
|---|---|
| City | ____ |
| County | x |
| School District | ____ |
| Water District | ____ |
| Abstract Co. | ____ |
| Other (specify) | ____ |

7. Enter the geographical coordinates of the site:

Latitude: 32 deg 35 min -- sec

Longtitude: 96 deg 18 min -- sec

8. Is the facility located on Indian lands? Check one:

____ Yes ___x___ No

B. Legal Description of Site

Submit as "Attachment C" a legal description(s) of the tract or tracts of land upon which the waste management operations referred to in this permit application occur or will occur. Although a legal description is required, a metes and bounds description is not necessary for urban sites with appropriate "lot" description(s).

C. Site Environmental and Technical Information

1. Climatic and Hydrologic

a. Is any portion of your waste management facility site (including proposed, active, and inactive portions) subject to flooding from adjacent or nearby surface water bodies under the following conditions?

| 24-hr Rainfall Event | Yes | No |
|---|---|---|
| 25-year | ___ | x |
| 50-year | ___ | x |
| 100-year | ___ | x |

b. Are there any producing groundwater wells on your site property?

____ Yes ___x___ No

If you checked "yes,"

(1) Indicate the number of such wells: _____, and

(2) Indicate the corresponding water uses below:

(a) Industrial uses:
Cooling water _____
Process water _____
Fire-control water _____

(b) Potable (drinking) water _____

(c) Agricultural uses:
Irrigation water for livestock food crops or grazing land _____
Livestock watering _____
Irrigation water for human food crops _____

c. Are any adjacent or nearby surface waters utilized by the applicant?

_____ Yes __X__ No

If you checked "yes," indicate the corresponding water uses below:

(1) Industrial uses:
Cooling water _____
Process water _____
Fire-control water _____

(2) Potable (drinking) water _____

(3) Agricultural uses:
Irrigation water for livestock food crops or grazing land _____
Livestock watering _____
Irrigation water for human food crops _____

2. Site Land Use and Subsidence Information

a. Is any portion of the overall site property utilized for agricultural purposes?

_____ Yes __X__ No

If you checked "yes," indicate the corresponding uses below:

(1) Grazing _____
(2) Livestock food crop _____
(3) Human food crop _____
If you checked no. (2) or (3), specify the types of crops grown. _____

b. Is any portion of the overall site property subject to land subsidence?

_____ Yes __X__ No

If you checked "yes," estimate the magnitude of the greatest subsidence that has occurred (in units of feet). _____

## III. WASTES AND WASTE MANAGEMENT

### A. Waste Generation and Management Activities

Is any hazardous industrial solid waste (see Title 40, Code of Federal Regulations, Part 261) presently or proposed to be generated at your facility?

X Yes ___ No

If you checked "no," go to Section III.B.2. below.
If you checked "yes," answer the following question.

1. Are you presently registered with TDWR as a solid waste generator?

   X Yes ___ No

   If you checked "no," contact the Solid Waste Section of TDWR in Austin, Texas to obtain registration information. Also, continue with the application form (go to Number 2 below).

   If you checked "yes," go to Section I of your Notice of Registration, determine which of your wastes are hazardous, and list these wastes (and mixtures) in Table III-1 (see Number 2 below).

2. Complete Table III-1 below, listing all hazardous wastes and all mixtures containing any hazardous waste which are presently or proposed to be generated at your facility. (see 40 CFR 261), attaching additional copies as necessary.

   In this table, "TDWR Sequence Number" refers to the number in the left-hand column in Section I of your Notice of Registration (Note: if you are not registered with TDWR, enter "NA" for TDWR Sequence Number and TDWR Waste Code Number).

   For the EPA Hazard Code and EPA Hazardous Waste Numbers, see 40 CFR 261.20-33. For annual quantity, provide the amount in units of pounds (as generated) for each waste and/or waste mixture.

   Please group the listings of wastes by SIC code, insofar as your processes are designated by SIC codings. Also, within the general SIC code groups, give a brief description of the specific process or operation from which the waste has been generated.

### B. Waste Management Facilities Summary

1. For each waste and waste mixture listed in Table III-1 that is presently or proposed to be stored on-site for longer than 90 days (see TDWR Rule 156.22.06.009), "processed" on-site [see TDWR Rule 156.22.04.002(a)(53)], or disposed on-site, provide the summary sheet shown in Table III-2 (Note: you must make copies of Table III-2 and submit the completed set of tables as "Attachment D").

Table III-1 Generated Hazardous Wastes and Management Activities

| Verbal Description of Waste | TDWR Sequence Number | TDWR Waste Code Number | EPA Hazard Code | EPA Hazardous Waste No. | Waste Management Activities (Check applicable items) | | | | Annual Quantity Generated (lbs) | SIC Code and Process |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | Off-Site Disposal | On-Site Storage[1] | On-Site Processing[2] | On-Site Disposal | | |
| Spent Pickle Liquor from Galv. Plant | NA | NA | CT | K062 | None | X | X | X | 110,000 Gal. 934000 lb | 3441 & 347 |
| | | | | | | | | | | |
| | | | | | | | | | | |
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| | | | | | | | | | | |

[1] "Storage" means the interim containment or control of waste after generation and prior to ultimate disposal.

[2] "Processing" means the extraction of materials, transfer, volume reduction, conversion to energy, or other separation and preparation of solid waste for reuse or disposal, including the treatment or neutralization of hazardous waste so as to render such waste nonhazardous, safer for transport, amenable for recovery, amenable for storage, or reduced volume. The "transfer" of solid waste for reuse or disposal as used above, does not include the actions of a carrier in conveying or transporting solid waste by truck, ship, pipeline, or other means.

Table III-2 Hazardous Waste Management Facility Component Summary Sheet

Verbal Description of Waste: Spent HCL Pickle Liquor

Process (see last column in Table III-1): 3441 and 3479

TDWR Sequence Number of Waste (if assigned): NA

Indicate the facility components used for storage/processing/disposal of the above-specified waste by entering the number of such facility components by which this waste is managed.

___ Lagoon/Pond (unlined)

5 Lagoon/Pond (lined)

___ Basin (earthen, above-grade lined)

___ Basin (earthen, above-grade unlined)

___ Basin (earthen, below-grade lined)

___ Basin (earthen, below-grade unlined)

___ Basin (concrete, above-grade lined)

___ Basin (concrete, above-grade unlined)

___ Basin (concrete, below-grade lined)

___ Basin (concrete, below-grade unlined)

___ Basin (other)

___ Pit (lined)

___ Pit (unlined)

___ Incinerator

___ Open Controlled Incineration Area

___ Boiler (energy-producing)

___ Landfill (sanitary)

___ Landfill (surface, open)

___ Landfill (other)

___ Landfarm

___ Landspreading Area

___ Spray Irrigation Area

___ Flood Irrigation Area

___ Septic Tank/Drain Field

___ Injection Well

___ Tank (surface storage)

___ Tank (sub-surface storage)

___ Tank (surface processing)

___ Tank (sub-surface processing)

___ Tank (other)

___ Drum Storage Area (open)

___ Drum Storage Area (enclosed)

___ Drum Storage Area (other)

___ Bulk Storage Area (open)

___ Bulk Storage Area (enclosed)

___ Bulk Storage Area (other)

___ Other (specify _____)

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2. Has the applicant at any time conducted the on-site disposal of industrial solid waste now identified or listed as hazardous waste?

   ____ Yes __X__ No

   If you checked "yes," complete Table III-3 indicating the hazardous industrial solid waste management facility components which were once utilized at your plant site but are no longer in service (i.e., inactive facility components).

   If you checked "no," and if no hazardous industrial solid waste is presently or proposed to be stored [for longer than 90 days (see TDWR Rule 156.22.06.009)], processed, or disposed of at your facility, then you need not file this permit application. Otherwise, proceed with application form.

3. For each facility component indicated in Table III-2 (Attachment D) and Table III-3, complete the following Table III-4 attaching additional copies as necessary. Enter the name of each facility component as specified in the earlier tables.

   Give the design capacity of each facility component in any of the units shown. In the case of inactive facilities for which design details are unavailable, an estimate of the design capacity is sufficient.

   Please note that each facility component should be described in your own words on the line provided for "verbal description."

4. Provide an estimate of the total weight (lbs) of hazardous industrial solid waste material that has been disposed of and/or stored within your site boundaries and not removed to another site.

C. Location of Waste Management Facilities and Components

1. Submit as "Attachment E" a drawn-to-scale topographic map (or other map if a topographic map is unavailable) extending one mile (and only one mile) beyond the property boundaries of the overall plant site, depicting the following:

   a. The approximate boundaries of the site (described in Section II B) and within these boundaries, the location and boundaries of the areas occupied by each active, inactive, and proposed facility component (see Tables III-2 and III-3 for facility components). Each depicted area should be labeled to identify the facility component(s), component status (i.e., active, inactive, or proposed), and area size in acres.

Table III-3 Inactive Hazardous Industrial Solid Waste Management Facility Components

Indicate the inactive facility components which were used for storage/processing/disposal of hazardous wastes or mixtures containing any hazardous waste by entering the number of such facility components in the space provided.

___ Lagoon/Pond (unlined)

___ Lagoon/Pond (lined)

___ Basin (earthen, above-grade lined)

___ Basin (earthen, above-grade unlined)

___ Basin (earthen, below-grade lined)

___ Basin (earthen, below-grade unlined)

___ Basin (concrete, above-grade lined)

___ Basin (concrete, above-grade unlined)

___ Basin (concrete, below-grade lined)

___ Basin (concrete, below-grade unlined)

___ Basin (other)

___ Pit (lined)

___ Pit (unlined)

___ Incinerator

___ Open Controlled Incineration Area

___ Boiler (energy-producing)

___ Landfill (sanitary)

___ Landfill (surface, open)

___ Landfill (other)

___ Landfarm

___ Landspreading Area

___ Spray Irrigation Area

___ Flood Irrigation Area

___ Septic Tank/Drain Field

___ Injection Well

___ Tank (surface storage)

___ Tank (sub-surface storage)

___ Tank (surface processing)

___ Tank (sub-surface processing)

___ Tank (other)

___ Drum Storage Area (open)

___ Drum Storage Area (enclosed)

___ Drum Storage Area (other)

___ Bulk Storage Area (open)

___ Bulk Storage Area (enclosed)

___ Bulk Storage Area (other)

___ Other (specify _____)

Table III-4 Hazardous Waste Facility Components List

| Facility Component | | Status | | | Design Capacity | | | Number of Years | Date in |
|---|---|---|---|---|---|---|---|---|---|
| Name | TDWR Seq. No. | Inactive | Active | Proposed | (cu yds) | (gal) | (lbs) | Utilized | Service |
| Pond No. 1 | NA | | x | | | 185,000 | | 19 | Unk. |
| Verbal Description: | | | | | | | | | |
| Pond No. 2 | NA | | x | | | 560,000 | | 13 | 11/70 |
| Verbal Description: | | | | | | | | | |
| Pond No. 3 | NA | | x | | | 785,000 | | 10 | 9/73 |
| Verbal Description: | | | | | | | | | |
| Pond No. 4 | NA | | x | | | 785,000 | | 7 | 5/76 |
| Verbal Description: | | | | | | | | | |
| Pond No. 5 | NA | | x | | | 785,000 | | 3 | 9/79 |
| Verbal Description: | | | | | | | | | |
| Verbal Description: | | | | | | | | | |

b. The overall facility and all surface intake and discharge structures;

c. All injection wells where liquids are injected underground;

d. All known monitor wells and boreholes within the property boundaries of the overall plant site; and

e. All wells, springs, other surface water bodies, and drinking water wells within the map area and the purpose for which each water well is used (e.g., domestic, livestock, agricultural, industrial, etc.).

2. Submit as "Attachment F" photographs which clearly delineate all hazardous waste facility structures and storage, processing, and disposal areas, as well as sites of future storage, processing, and disposal areas.

D. Flow Diagram/Description

Show as "Attachment G" process flow diagrams or step-by-step word descriptions of the process flow, depicting the handling, collection, storage, processing, and/or disposal of each of the hazardous wastes previously listed in this application.

The flow diagrams or descriptions should include the following information:

1. Originating point of each waste and waste classification code;

2. Means of conveyance utilized in every step of the process flow;

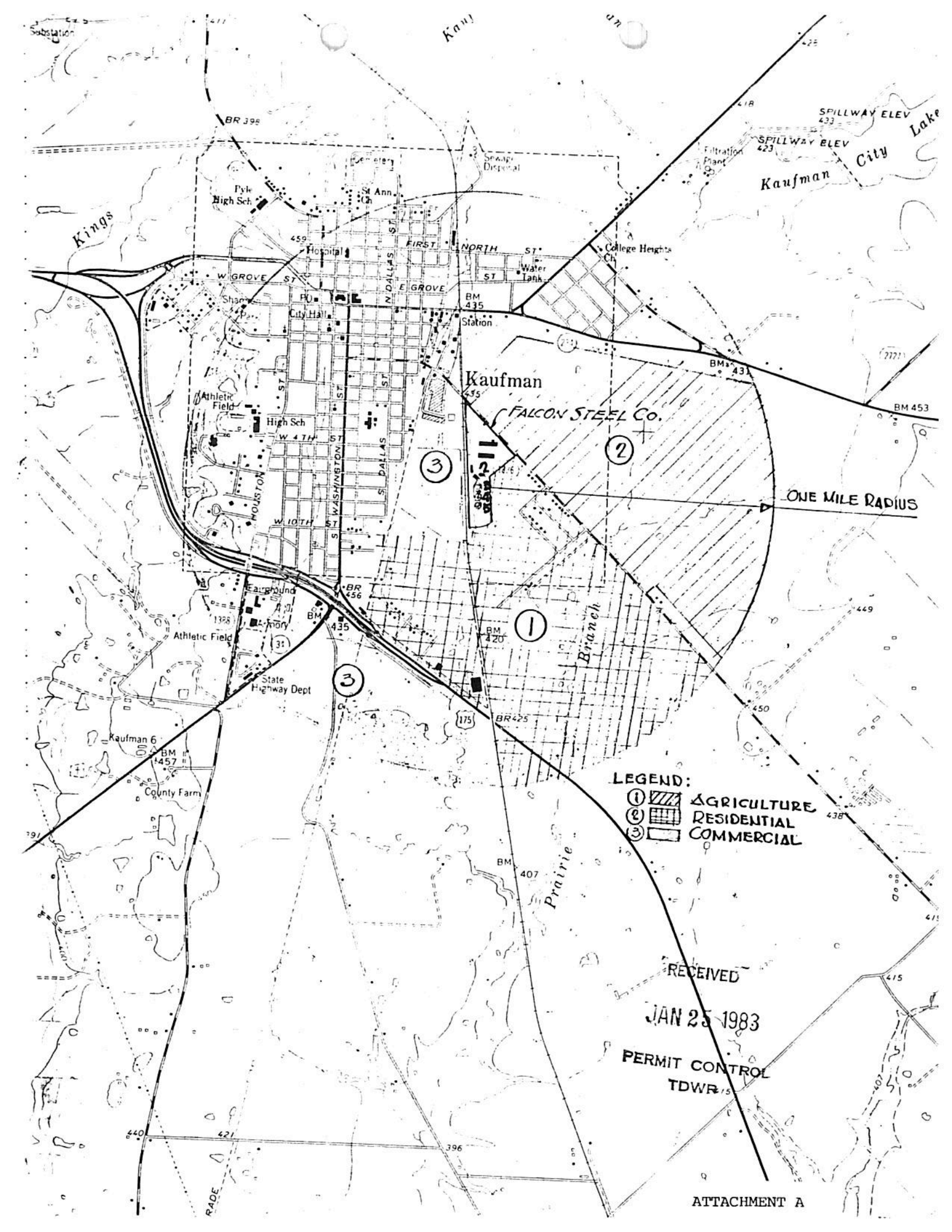
3. Name and function of each facility component through which the waste passes;

4. The ultimate disposition of all wastes (if off-site, specify "off-site") and waste residues.

## IV. INDEX OF ATTACHMENTS

List and index below all attachments to this application and indicate if included or not included:

| Item | Mandatory Attachments | Attachment | Included | Not Included |
|---|---|---|---|---|
| II.A.5. | USGS map | A | X | ___ |
| II.A.6.a. | Affected landowners | B | X | ___ |
| II.B. | Site legal description | C | X | ___ |
| III.B.1. | Hazardous waste facility component summary sheets | D | X | ___ |
| III.C.1. | Facility boundaries and adjacent waters map | E | X | ___ |
| III.C.2. | Photographs | F | X | ___ |
| III.D. | Process flow diagram/description | G | X | ___ |
| | Other Attachments as Required | | | |
| I.D.2.a. | Lease | ___ | ___ | ___ |
| III.A.2. | Additional generated waste list (Table III-1) | ___ | ___ | ___ |
| III.B.3. | Additional hazardous waste facility components list (Table III-4) | ___ | ___ | ___ |


Kaufman
FALCON STEEL CO.
ONE MILE RADIUS
LEGEND:
1 AGRICULTURE
2 RESIDENTIAL
3 COMMERCIAL
Kaufman City Lake
Kings
Prairie Branch
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ATTACHMENT A

PROPERTY OWNERS:

1. Meredith, Meredith & Campbell
   P. O. Box 2050
   Dallas, Texas

2. Mrs. B. A. Scott Estate
   Kaufman, Texas 75142

3. M. H. Morrow and wife
   Kaufman, Texas 75142

4. A. W. Davis
   P. O. Box 462
   Kaufman, Texas 75142

5. Mrs. Alex Tinnin
   Kaufman, Texas 75142

6. Herman Cochran
   Rt. 1
   Kaufman, Texas 75142

7. Hyrtice Choyce
   Rt. 1
   Kaufman, Texas 75142

8. Joe Creecy
   P. O. Box 323
   Forney, Texas 75126

9. George Brown and Alice Bell
   1005 S. Medora
   Terrell, Texas 75160

10. Charles Howell
    Rt. 2, Box 107-B2
    Mansfield, Texas 76063

WASTE FLOW DESCRIPTION:

Waste is generated in the steel cleaning area of our galvanizing facility. When each of our pickling tanks reaches the absorption point with iron oxide, the liquid is pumped by electrically powered centrifugal pumps through 2" dia. rubber conduits to one of five evaporative storage basins at a distance of approximately 500 feet. The waste remains in these basins.

**proko** Industries, Inc.
*Drywall Finishes & Specialty Coatings*
GENERAL OFFICES: P.O. BOX 15768, DALLAS, TEXAS 75215
TELEPHONE 214-428-1373

August 10, 1981

Mr. Dwight Corley
EPA -6AEP
1201 Elm Street
Dallas, TX 75270

Dear Mr. Corley:

With reference to our telephone conversation on 7/30/81, we would like an official ruling in regard to hazardous waste we may or may not be generating. We have three areas of concern:

First, we use asbestos fibers in the manufacture of a very limited number of our products. This material is packaged in 50# multi-wall paper bags. Our only concern is with the empty bags, not the asbestos. We place the empty bags inside a large plastic bag and store them in a 55 gallon drum.

Second, the use of Phenol Mercury acetate. We use this substance in our manufacturing process as a preservative. The PMA is supplied to us in a dry powder form packaged in water soluble packets. The water soluble bags are contained in a clear plastic bag. Again, our area of concern is the empty plastic bag. Once the water soluble packet is removed from the plastic container, it is disposed of in the exact same manner as our empty asbestos bag.

Our third area of concern is with the sludge generated by the cleaning of our mixing equipment. We have a 500 and 250 gallon blender to manufacture our finished products. This equipment is routinely flushed with water every few days to control bacteria growth in this equipment. The only item contained in this sludge we are concerned with is the phenol mercury acetate. The sludge generated from the flushing of this equipment goes directly to a 2500 gallon underground storage tank. Over a period of time, approximately once or maybe twice a year, the sludge build up will reach a point that it must be pumped out.

Enclosed are copies of letters to our Georgia and South Dakota plants declaring our waste non-hazardous, along with your EPA Form 3510-3, listing page 3 on page one.

We are requesting your decision and permission to dispose of our waste at the local land fill and/or local sewage treatment plant.

Sincerely,

PROKO INDUSTRIES, INC.

E. W. Mansfield
Production Manager

EWM/lp

Enclosures

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VI
1201 ELM STREET
DALLAS, TEXAS 75270

July 30, 1981

Falcon Steel Co-Kaufman Division
Attn: Eddie Evans
P.O. Box 269
Kaufman, Texas 75142

EPA ID NUMBER: TXD 05 866 7973

FACILITY LOCATION: 1200 Rand Road
Kaufman, Texas

This is to acknowledge that the Environmental Protection Agency has completed processing the information submitted in your Part A Hazardous Waste Permit Application. It is the Agency's opinion, based on the assumption that the information submitted is complete and accurate, you as an owner or operator of a hazardous waste management facility have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. EPA has not verified the information submitted. If it is determined that the information is incomplete or inaccurate, you may be asked to provide additional information or in certain circumstances it may be determined that you do not qualify for interim status. In addition, this notice does not preclude a citizen from taking legal action under the provisions of Section 7002 of RCRA.

A facility not meeting the requirements for interim status under Section 3005 of RCRA may be required to close until such time as a hazardous waste permit is issued. Interim status may also be terminated, according to procedures in 40 CFR Part 124, if the owner or operator fails to furnish additional information which EPA requests in order to process a permit application.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265 or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The enclosure to this letter identifies the processes your facility may use, their design capacities and the types of waste your facility may accept during interim status. This information was obtained from the Part A Permit Application. If you wish to handle new wastes, change processes, increase the design capacity of existing processes, or change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

If you have any questions concerning this letter, please contact Dwight Corley at (214) 767-2765, or write Mail Code 6E-P, 1201 Elm Street, Dallas, Texas 75270.

Sincerely,

Diana Dutton, Director
Enforcement Division (6E)

cc: Texas Department of Water Resources

CONDITIONS OF OPERATION DURING
INTERIM STATUS

Date prepared: July 30, 1981

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

I. Facility name, location and EPA identification number:

Name: Falcon Steel Co-Kaufman Division'

Location: 1200 Rand Road

Kaufman, Texas

EPA ID No: TXD 05 866 7973

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265:

Owner's name: Falcon Steel Company

Operator's name: Falcon Steel Company

III. During the period of interim status, the facility may use only the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated:

| Process Code | Design Capacity Amount | Unit of Measure |
|---|---|---|
| S04 | 1,675,000. | Gallons |
| T02 | 2,240. | Gallons per day |
| | | |
| | | |
| | | |

IV. During the period of interim status, the facility may handle only the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid wastes exhibiting hazardous characteristics with the following EPA Hazardous Waste Numbers:

K062

EPA Region VI, Dallas, TX 75270
(214) 767-2765